

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

[REDACTED] and
ENRICO ANTWAN HOOD-JACKSON,
Defendants

*
*
* CRIMINAL NO.

23-cr-00223-DLB

USDC- GREENBELT
'23 JUN 28 PM4:43

(Conspiracy to Commit Mail and Bank Fraud, 18 U.S.C. § 1349; Bank Fraud, 18 U.S.C. § 1344; Theft of Mail Matter, 18 U.S.C. § 1708; Robbery of United States Property, 18 U.S.C. § 2114(a); Use, Carry, and Brandish a Firearm During and in Relation to a Crime of Violence, 18 U.S.C. § 924(c); Possession of a Machinegun, 18 U.S.C. § 922(o); Unlawful Possession of Postal Service Keys, 18 U.S.C. § 1704; Aiding and Abetting, 18 U.S.C. § 2; Forfeiture, 18 U.S.C. § 981(a)(1)(C); 21 U.S.C. § 853)

INDICTMENT

COUNT ONE

(Conspiracy to Commit Mail Fraud and Bank Fraud)

The Grand Jury for the District of Maryland charges that:

Introduction

At all times material to this Indictment:

1. Defendant [REDACTED] was a resident of Maryland.
2. Defendant ENRICO ANTWAN HOOD-JACKSON ("HOOD-JACKSON")

was a resident of Maryland.

3. Navy Federal Credit Union, Bank of America, Chase, and other consumer banks (collectively, the "victim financial institutions") were financial institutions within the meaning of

18 U.S.C. § 20 in that their deposits were insured by the Federal Deposit Insurance Corporation or the National Credit Union Share Insurance Fund.

4. The victim businesses included postal customers located in Maryland, Virginia, Washington, D.C., Pennsylvania, and Texas.

5. The individual victims of criminal activities described in this Indictment were postal customers and included Individual A and Individual B, residents of Maryland.

The Conspiracy and Scheme to Defraud

6. Beginning at least on or about January 31, 2022, and continuing through at least on or about November 8, 2022, in the District of Maryland and elsewhere, the defendants,

[REDACTED] and
ENRICO ANTWAN HOOD-JACKSON,

did knowingly and willfully combine, conspire, confederate, and agree with each other and others known and unknown to the Grand Jury:

a. to commit bank fraud, that is, to execute and attempt to execute a scheme and artifice to defraud the victim financial institutions, and to obtain and attempt to obtain monies, funds, credits, assets, and securities owned by, and under the custody and control of, the victim financial institutions by means of materially false and fraudulent pretenses, representations, and promises (“the scheme to defraud”), in violation of 18 U.S.C. § 1344; and

b. to commit mail fraud, that is, to devise and intend to devise a scheme and artifice to defraud the victim financial institutions, and to obtain money and property from the victim financial institutions by means of false and fraudulent pretenses, representations, promises, and material omissions (“the scheme to defraud”), and for the purpose of executing and attempting to execute the scheme to defraud, to take and receive from any post office and authorized depository for mail matter any matter or thing to be sent or delivered by the Postal

Service, in violation of 18 U.S.C. § 1341.

Manner and Means of the Conspiracy and Scheme to Defraud

7. It was part of the conspiracy and scheme to defraud that:

a. [REDACTED] **HOOD-JACKSON**, and their coconspirators forcibly robbed

United States Postal Service (“USPS”) mail carriers of proprietary Arrow keys, which allowed access to USPS depositories.

b. [REDACTED] **HOOD-JACKSON**, and their coconspirators used the stolen

Arrow keys to access authorized USPS depositories in order to take mail matter, including checks that the victim businesses and individual victims had placed in the mail for delivery to various payees.

c. [REDACTED] **HOOD-JACKSON**, and their coconspirators altered checks

stolen from the mail so that the checks appeared to be payable to accounts the conspirators controlled.

d. [REDACTED] **HOOD-JACKSON**, and their coconspirators negotiated and

caused to be negotiated the altered checks, thereby obtaining funds that were in the care, control and custody of the victim financial institutions.

e. [REDACTED] **HOOD-JACKSON**, and their coconspirators traveled to

branches of the financial institutions hosting the accounts which the conspirators controlled, deposited checks into those accounts, and subsequently withdrew the funds.

f. [REDACTED] **HOOD-JACKSON**, and their coconspirators fraudulently

obtained and attempted to obtain at least \$859,000.00 from the individual and business victims,

as well as victim financial institutions, by diverting funds from individual and business victims' accounts into accounts the coconspirators controlled.

18 U.S.C. § 1349

COUNTS TWO AND THREE
(Bank Fraud)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 1 through 5 and 7 of Count One of this Indictment are incorporated here and constituted a scheme and artifice to defraud the victim financial institutions by means of materially false and fraudulent pretenses, representations, and promises and material omissions (the “scheme to defraud”).
2. On or about the dates set forth below, in the District of Maryland and elsewhere, the defendant,



knowingly executed, and attempted to execute, a scheme and artifice to defraud a financial institution, and to obtain any of the monies, funds, credits, assets, and other property owned by and under the custody and control of a financial institution by means of material false and fraudulent pretenses, representations and promises; to wit:

| Count | Approx. Date | Description |
|--------------|---------------------|---|
| 2 | February 14, 2022 | Deposited an altered check in the amount of \$27,398.90 at a Navy Federal Credit Union in Clinton, Maryland |
| 3 | June 27, 2022 | Deposited an altered check in the amount of \$16,047 written on an account at Sandy Spring Bank |

18 U.S.C. § 1344
18 U.S.C. § 2

COUNT FOUR
(Theft of Mail Matter)

The Grand Jury for the District of Maryland further charges that:

On or about October 23, 2022, in the District of Maryland, the defendant,

ENRICO ANTWAN HOOD-JACKSON,

did knowingly steal, take, abstract, and obtain by fraud or deception mail matter from and out of any authorized depository for mail matter, namely an authorized depository for mail matter located in Potomac, Maryland.

18 U.S.C. § 1708
18 U.S.C. § 2

COUNT FIVE
(Theft of Mail Matter)

The Grand Jury for the District of Maryland further charges that:

On or about October 27, 2022, in the District of Maryland, the defendants,

[REDACTED] and
ENRICO ANTWAN HOOD-JACKSON,

did knowingly steal, take, abstract, and obtain by fraud or deception mail matter from and out of any authorized depository for mail matter, namely three authorized depositories for mail matter located in Potomac, Maryland.

18 U.S.C. § 1708
18 U.S.C. § 2

COUNT SIX
(Robbery of United States Property)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 1 and 7(a) of Count One of this Indictment are incorporated here.
2. On or about May 25, 2022, in the District of Maryland, the defendant,

[REDACTED]

did assault any person having lawful charge, control, and custody of any mail matter and other property of the United States—that is, a USPS mail carrier—with intent to rob, steal, and purloin said mail matter and other property of the United States—that is, a USPS Arrow key—and did rob said person of mail matter and other property of the United States, and, in effecting such robbery, the defendant put the life of said person in jeopardy by the use of a dangerous weapon, that is, a firearm.

18 U.S.C. § 2114(a)
18 U.S.C. § 2

COUNT SEVEN
(Robbery of United States Property)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 2 and 7(a) of Count One of this Indictment are incorporated here.
2. On or about October 20, 2022, in the District of Maryland, the defendant,

ENRICO ANTWAN HOOD-JACKSON,

did assault any person having lawful charge, control, and custody of any mail matter and other property of the United States—that is, a USPS mail carrier—with intent to rob, steal, and purloin said mail matter and other property of the United States—that is, a USPS Arrow key—and did rob said person of mail matter and other property of the United States, and, in effecting and attempting to effect such robbery, the defendant put the life of said person in jeopardy by the use of a dangerous weapon, that is, a firearm.

18 U.S.C. § 2114(a)
18 U.S.C. § 2

COUNT EIGHT

(Use, Carry, and Brandish a Firearm During and in Relation to a Crime of Violence)

The Grand Jury for the District of Maryland further charges that:

On or about May 25, 2022, in the District of Maryland, the defendant,

[REDACTED]

did knowingly use, carry, and brandish a firearm during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, that is, robbery of United States property, in violation of 18 U.S.C. § 2114(a), as set forth in Count Six of this Indictment and incorporated here.

18 U.S.C. § 924(c)(1)(A)(i) & (ii)

COUNT NINE

(Use, Carry, and Brandish a Firearm During and in Relation to a Crime of Violence)

The Grand Jury for the District of Maryland further charges that:

On or about October 20, 2022, in the District of Maryland, the defendant,

ENRICO ANTWAN HOOD-JACKSON,

did knowingly use, carry, and brandish a firearm during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, that is, robbery of United States property, in violation of 18 U.S.C. § 2114(a), as set forth in the Count Seven of this Indictment and incorporated here.

18 U.S.C. § 924(c)(1)(A)(i) & (ii)

COUNT TEN
(Possession of a Machinegun)

The Grand Jury for the District of Maryland further charges that:

On or about September 29, 2022, in the District of Maryland, the defendant,

[REDACTED]

knowingly possessed a machinegun, as defined by 18 U.S.C. § 921(a)(23) and 26 U.S.C. § 5845(b),
that is, a Polymer 80 9mm handgun with a full-automatic switch installed.

18 U.S.C. § 922(o)

COUNT ELEVEN
(Unlawful Possession of Postal Service Keys)

The Grand Jury for the District of Maryland further charges that:

On or about September 29, 2022, in the District of Maryland, the defendant,

[REDACTED]

did knowingly and unlawfully possess keys suited to locks adopted by the United States Postal Service and in use on authorized receptacles for the deposit and delivery of mail matter, with the intent to use, sell, and otherwise dispose of said keys unlawfully and improperly.

18 U.S.C. § 1704

18 U.S.C. § 2

COUNT TWELVE
(Unlawful Possession of Postal Service Keys)

The Grand Jury for the District of Maryland further charges that:

On or about October 27, 2022, in the District of Maryland, the defendants,

[REDACTED] and
ENRICO ANTWAN HOOD-JACKSON,

did knowingly and unlawfully possess any key suited to any lock adopted by the United States Postal Service and in use on authorized receptacles for the deposit and delivery of mail matter, with the intent to use, sell, and otherwise dispose of said key unlawfully and improperly.

18 U.S.C. § 1704
18 U.S.C. § 2

FORFEITURE ALLEGATION

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the defendants that the United States will seek forfeiture as a part of any sentence in accordance with 18 U.S.C. §§ 924(d), 981(a)(1)(C) and 982, 21 U.S.C. § 853(p), and 28 U.S.C. § 2461(c) in the event of the defendants' conviction on any of the offenses charged in Counts One through Ten of this Indictment.

Wire Fraud, Mail Theft, and Robbery Forfeiture

2. Upon conviction of any of the offenses charged in Counts One through Seven of this Indictment, the defendants,

[REDACTED] and
ENRICO ANTWAN HOOD-JACKSON,

shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to such offense.

Bank Fraud Forfeiture

3. Upon conviction of any of the offenses charged in Counts One through Three of this Indictment, the defendants,

[REDACTED] and
ENRICO ANTWAN HOOD-JACKSON,

shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2), any property constituting, or derived from, proceeds obtained directly or indirectly, as the result of such offense.

Firearms Forfeiture

4. Upon conviction of any of the offenses alleged in Counts Six through Ten of this Indictment, the defendant,

[REDACTED] and
ENRICO ANTWAN HOOD-JACKSON,

shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in the offenses.

Property Subject to Forfeiture

5. The property to be forfeited includes, but is not limited to:

- a. a money judgment in the amount of proceeds each defendant obtained as the result of his participation in any offenses of conviction; and
- b. a Polymer 80 9mm handgun with a full-automatic switch installed.

Substitute Assets

6. If, as a result of any act or omission of the defendant, any of the property described above as being subject to forfeiture:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty;

the United States shall be entitled to forfeiture of substitute property of the defendant pursuant to
21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1) and 28 U.S.C. § 2461(c).

18 U.S.C. § 981(a)(1)(C)
18 U.S.C. § 982
21 U.S.C. § 853(p)
28 U.S.C. § 2461(c)

Erek L. Barron
Erek L. Barron
United States Attorney

A TRUE BILL:

SIGNATURE REDACTED